

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

KEITH R. REINHARD and
STACY REINHARD,

Plaintiffs,

AMERISURE INSURANCE COMPANY
and DEAN HEALTH PLAN,

Involuntary Plaintiffs,

No. 2:19-cv-01732-LA

Judge Lynn Adelman

vs.

JPW INDUSTRIES INC., et al.,

Defendants.

**JPW INDUSTRIES INC.'S CIVIL L. R. 7(H) EXPEDITED NON-
DISPOSITIVE MOTION FOR EXTENSION TO DISCLOSE EXPERT
WITNESSES AND FOR A TELEPHONIC STATUS CONFERENCE**

JPW Industries Inc. ("JPW") requests that the Court grant a one-month extension for defendants to disclose and produce expert witnesses and hold a telephonic status conference for compliance with the March 11, 2020 Scheduling Order (ECF No. 16). In support, JPW states the following:

1. Under the Scheduling Order, defendants must disclose expert witnesses by November 11, 2020, and require more time to do so given delays in receiving medical authorizations from plaintiffs and third-party productions.
2. After many months delay and many emails to plaintiffs' counsel, phone calls to plaintiffs' counsel, and discovery conferences with plaintiffs' counsel, plaintiffs only produced the final signed authorization on October 27, 2020. JPW

has requested the records with the signed authorization, but it does not expect production before the November 11, 2020 expert report deadline.

3. Without the production (and the timely signed authorization), JPW cannot disclose expert witnesses consistent with Fed. R. Civ. P. 26(a)(2) and will be unfairly prejudiced in its defense.

4. Additionally, a telephonic status conference is appropriate to understand if, and how, plaintiffs expect to proceed because they have not served initial disclosures under Fed. R. Civ. P. 26(a)(1), disclosed expert witnesses under Fed. R. Civ. P. 26(a)(2), nor otherwise complied with the Scheduling Order.

CONCLUSION

For these reasons, JPW Industries Inc. requests that the Court grant a one-month extension for defendants to disclose and produce expert witnesses and hold a telephonic status conference for compliance with the Scheduling Order.

Dated: November 2, 2020

Respectfully submitted,

/s/ Brian O. Watson

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CERTIFICATE OF SERVICE

The undersigned attorney certifies on November 2, 2020, these papers were electronically filed using the CM/ECF system, which will send notice to all counsel of record.

/s/ Brian O. Watson

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